

#4

15 BH/ BSC

NO FEE/NO IFP

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT
PENNSYLVANIA

FILED

JAN 08 2020

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

Docket No
20-27

Randall E. Hockett

v.

Allegheny County Jail, Orlando Harper, Deputy
Superintendent Zetwell, Major Smith, Capt. Brian Joseph
Capt. Walker, Sgt. Sarver, Charley Gross, C.O. Bessilemen
C.O. Kelly, C.O. Pania, C.O. Caldwell, Sgt. Andriak
Sgt. Hall, C.O. ~~Sandino~~, C.O. Mike Denis, Sgt. Landin.
Allegheny County Police Internal Affairs Dept. Office
Of The District Attorney Steve Zappia

Complaint

Introduction:

Plaintiff Randall E. Hockett states the Allegheny County Jail, and Allegheny County Police Internal Affairs Dept. and Office Of The District Attorney has conspired together to retaliate, cover up, oppress, conceal and frustrate Plaintiffs 1st Amendment right of Access to the Court and 6th Amendment Right to a Fair trial by intentionally losing or destroying "all" of Plaintiffs legal/work ^{property} (Crime Scene Pictures, medical records, ^{post sentencing motions} Discatch Records, G.P.S. Documents, Motions, Civil Suits, Complaints, Habeas Corpus, Discovery, Criminal Complaint, Affidavit, and other documents that shows his innocences). Appeals and the like) To stop Plaintiff from proving his innocence and getting out of jail and pursuing other legal issues and matters. Plaintiff states that his 5th and 14th Amendment rights was violated when he was deprived of his Property with out due Process of Law. Plaintiff seeks an immediate injunction to have All camera footage from the Allegheny County Jail on 6E Jail From 12-28-2019 till 1-3-20 including all hallway cameras on 6E from above dates saved and held for further investigation

and evidence in this matter. Plaintiff also seeks to have the U.S. Attorney General Appointed to Prosecute this case As members has aided and abetted and conspired to cover up an attempted homicide by intentionally destroying his all of his legal property to stop further prosecution in other cases by destroying evidence.

Plaintiff seeks damages in 750,000.000 \$ million. If All of his legal property is Not found.

- 1). Plaintiff Randall E. Hockett can be found at the Allegheny County Jail 950 2nd Ave. Pgh. Pa. 15219. Plaintiff Randall E. Hockett has Filed numerous Motions and Petitions in State Court See Criminal Docket 2018-02528 including a Post Sentencing Motion, he also has a Habeas Corpus Filed in Federal Court See 2:19-1232 and has a 1983 Filed with this Federal Court See Hockett v. Wilkinsburg Police Department et al 2:18-1213.
- 2). All the above cases deals with Hockett being shot multiple times unlawfully by Wilkinsburg Police Officer and has innocences of a crime. Hockett has provided Numerous documents as evidence that shows That Officer "John Snider" was not Present G.P.S. Documents. Dispatch Records. Affidavit From Laurie McKel Criminal Complaint attach to all motions Complaint all of these Documents as well as all of his legal mail / legal property was lost or destroyed on 12-28-19 or 1-3-2020
- 3). Defendant Allegheny County Jail can be found at 950 2nd Ave. Pgh. PA. 15219
- 4). Defendant Orlando Harter is the warden of the Allegheny County Jail (A.C.J) he is responsible for all policies and daily operations of the A.C.J. he can be found at 950 2nd Ave. Pgh. Pa. 15219.
- 5). Defendant Zetwell is the Deputy Supt. of the Allegheny County Jail he can be found at 950 2nd Ave. Pgh. PA. 15219.
- 6). Defendant Smith is a Mayor at the A.C.J. in charge of the R.H.U. he can be Found at 950 2nd Ave. Pgh. Pa. 15219.
- 7). Defendant Brian Joseph is a Capt. at the A.C.J. and Can be found at 950 2nd Ave. Pgh. Pa. 15219.
- 8). Defendant Walker is a Capt. at the A.C.J. he can be found at the 950 2nd Ave. Pgh. Pa. 15219.

- 9). Defendant Sarver is a Sot at the A.C.J. he can be found at 950 2nd Ave. Pgh. Pa. 15219.
- 10). Defendant Charles Gross is Correctional Officer (C.O) at the A.C.J. can be found at 950 2nd Ave. Pgh. PA 15219
- 11). Defendant Bessilemen is a Correctional Officer who works to E at the A.C.J. can be found at 950 2nd Ave. Pgh. PA. 15219.
- 12). Defendant Kelly is a C.O. at the A.C.J. who works in the R.H.U. he can be found at 950 2nd Ave. Pgh Pa. 15219.
- 13). Defendant Parria is a C.O. at the A.C.J. who works in the R.H.U. he can be found at 950 2nd Ave. Pgh Pa. 15219.
- 14). Defendant Caldwell is a C.O. At the A.C.J. he can be found at 950 2nd Ave. Pgh. PA. 15219.
- 15). Defendant Andrick is a Sot at the A.C.J. and works the R.H.U. He can be found at 950 2nd Ave. Pgh. PA. 15219.
- 16). Defendant Hall is a Sot. at the A.C.J. can be found at 950 2nd Ave. Pgh. PA. 15219
- 17). Defendant Sanchez is a C.O. at the A.C.J. and works the R.H.U. and can be found at 950 2nd Ave. Pgh. PA 15219
- 18). Defendant Mike Demis is a C.O. and works at to E at the A.C.J. he can be found at 950 2nd Ave. Pgh. PA. 15219
- 19). Defendant Panza is a C.O. that works in the R.H.U he can be found at 950 2nd Ave Pgh Pa. 15219
- 20). Defendant Lovdin is a Sot at the A.C.J. he can be found at 950 2nd Ave. Pgh. Pa. 15219.
- 21). Defendant Allegheny County Police Internal Affairs Dept. can be found at 950 2nd. Ave. Pgh. PA. 15219.
- 22). Defendant Office of the District Attorney can be found at 436 Grant St. Pgh. PA. 15219
- 23). Defendant Steven Zappala is the head of the office of the D.A. he can be found at 436 Grant St. Pgh. PA. 15219
- 24). All Defendants Name herein is sued in both their Official and individual Capacities.

25) All Defendants acted under the color of Law while mention this complaint.

Statement of Facts

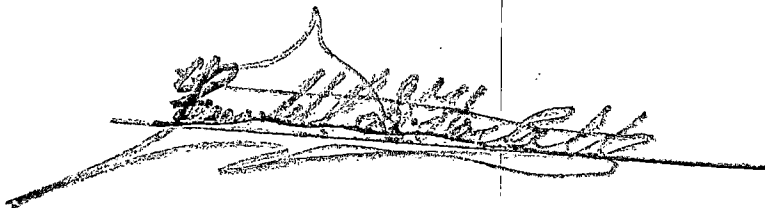
- 26) On 12-28-2019 while in the ICE on 6E 204 cell Plaintiff was told by C.O. Charles Gross to Pack your shit your going to the whole. Plaintiff Pack all his belongings.
- 27) A short time later Sgt. Sarver. and C.O. Kelly came and got Plaintiff From his cell. Sgt. Sarver stated "We had orders From Capt. Joseph to come get you and take you to the whole." Plaintiff was taken to medical then to the whole. Without any of his Property despite all of his Property being Pack up and ready to go and Sgt. Sarver stating I will go back and get all of your property, He Never did.
- 28) On 12-29-2019 Sgt. Hall came to 8E 118 cell and ask about a coin "Plaintiff informed her that he probably left it at medical or p.t.d. Plaintiff asked about his property and was told "Your property is being investigated by Internal Affairs." "I.A. has your property."
- 29) Plaintiff spoke to Capt. Joseph on the next shift about his property being sent to I.A. Plaintiff was told From what I'm told your being investigated you have something in your property your Not supposed to. it might be the D.A.'s Office. From what I'm told. do what you gotta do.
- 30) Since Then 12-29-19 up till 1-4-2020 Plaintiff has spoken to Pamela. Coldwell. Sandra Sgt. Andresic. Sgt. Landen. Coscorrell. McGuire, and was told. I called down "To 6E and Dennis told me your Property is not down there" Bessileman said its not down there. I will check. "I.A. has your Property" "Your Property has throw away"
- 31) Plaintiff has also submitted a Grievance regarding this situation See Exhibit 1 where 3,000 Pages of legal work is missing.
- 32) Plaintiff was given 47 To 87 years SENTENCE for a crime that never happen and that he is innocent of Once Plaintiff found out that all of his legal property was missing he is afraid, scared, depressed and feels hopeless. Plaintiff hasn't been sleeping. Plaintiff is unable to pursue other legal issues or Provide Exhibits and evidence in other cases. Appeals.
- 33) Plaintiffs property being missing ^{or destroyed} was the result of inadequate training / policy or resulted from Defendants A.C.J. Orlando Herger. Deputy such. Zetzel. Major Smith. Capt. Joseph. being deliberate Indifference thereto. or Allegheny County Internal Affairs Police Dept. Office of the D.A. Steve Zandora being deliberate Indifference thereto.
- 34) Paragraphs 1 thru 33 are incorporated herein as if fully set forth herein
- 35) Plaintiff states All Defendant(S) actions or inactions resulted in him being unable to Present Evidence in court. denied him access to the court and being retaliated upon all in violation of the 1st Amendment

TO the U.S. Constitution

- 36). Paragraphs 1 through 35 are incorporated herein as if fully set forth herein
- 37). Defendant(s) actions or inaction in losing or destroying his 3,000 pages of legal property or being deliberate indifference thereto through policies Plaintiff states he is being denied a 6th Amendment Right to a Fair trial By Defendants actions
- 38). Paragraphs 1 thru 37 are incorporated herein as if Fully set forth herein
- 39). Defendant(s) actions or inactions or being deliberate indifference to losing destroying his legal property or taking his property denied him Due Process of Law under the 5th and 14th Amendments to the United States Constitution.

Relief

- A) Injunction to have all cameras on 6 E pool level 10 and 8 held saved for further investigation in this matter.
- B) Compensatory and Punitive Damages in 750,000.000 \$
- C) Jury trial demanded
- D) Attorney General be appointed to prosecute this case.
- E) All of my Property found and given to me
- F) I reserve all other rights at law in this matter
- G). Any other relief this court deems just and right.



1-5-2020